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Attorneys for Defendant
UNION PACIFIC RAILROAD COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO COURTHOUSE

KENNETH SNYDER,

Plaintiff,

v.

UNION PACIFIC RAILROAD
COMPANY, a corporation,

Defendants.

Case No. 2:21-cv-01487-WBS-KJN

**STIPULATION TO CONTINUE PRE-TRIAL
DEADLINES; [PROPOSED] ORDER**

Trial: May 31, 2023

STIPULATION TO CONTINUE PRE-TRIAL
DEADLINES; [PROPOSED] ORDER
CASE NO. 2:21-CV-01487-WBS-KJN

WHEREAS,

The parties have been diligently conducting discovery and defendant's employee depositions are scheduled to occur over the next few weeks;

Defendant will be taking plaintiff's deposition in October;

Defense counsel are starting a new law firm on October 1, 2022 and will need to spend substantial amounts of time over the new few weeks getting that new firm up and running and transitioning their law practice from the current firm to the new firm;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff KENNETH SNYDER and Defendant UNION PACIFIC RAILROAD COMPANY to request that the Court modify certain pre-trial deadlines as follows.

The pre-trial deadlines are currently scheduled as follows [Doc 6]:

1. Expert Disclosure: September 9, 2022;
2. Rebuttal Expert Disclosures: October 11, 2022;
3. Discovery Deadline: November 10, 2022;
4. Motion Filing Deadline: January 13, 2023;
5. Pre-Trial Conference: March 27, 2023;
6. Trial Date: May 31, 2023;

The parties respectfully request the following new dates, or such other similar dates as are convenient for the Court.

1. Expert Disclosure: November 15, 2022;
2. Rebuttal Expert Disclosures: December 13, 2022;
3. Discovery Deadline: January 13, 2023;
4. Motion Filing Deadline: January 27, 2023;
5. Pre-Trial Conference: March 27, 2023 [unchanged];
6. Trial Date: May 31, 2023 [unchanged].

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1 DATED: September 6, 2022

HILDEBRAND, McLEOD & NELSON, LLP

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3 By: /s/ Charles Bracewell

4 PAULA A. RASMUSSEN

5 CHARLES BRACEWELL

6 Attorneys for Plaintiff

7 KENNETH SNYDER

8 DATED: September 6, 2022

UNION PACIFIC RAILROAD COMPANY

9
10 By: /s/ Alexei Offill-Klein

11 VINCENT CASTILLO

12 ALEXEI OFFILL-KLEIN

13 Attorneys for Defendant

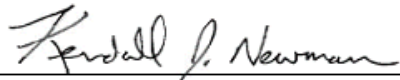
14 UNION PACIFIC RAILROAD COMPANY

ORDER

Good cause appearing, the parties' Stipulation to Continue Pre-Trial Deadlines is APPROVED, and the scheduling order is hereby modified as set forth in the stipulation.

IT IS SO ORDERED.

Dated: September 6, 2022


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE

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